

QUIN DENVIR, Bar No. 049374
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Attorney for Defendant
Matthew McCall, Jr.

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,)	
)	No. CR S-05-0190 GEB
Plaintiff,)	
)	
v.)	
)	
MATTHEW McCALL, Jr.,)	STIPULATION AND [PROPOSED]
)	ORDER
Defendant.)	
_____)	

Plaintiff United States of America, by its counsel, Assistant United States Attorney R. Steven Lapham, and defendant Matthew McCall, by his counsel, Federal Defender Quin Denvir, hereby stipulate and agree that the trial confirmation hearing scheduled for July 1, 2005 and the jury trial scheduled for July 19, 2005 should be vacated and the case should be set for status conference on Friday, August 12, 2005 at 9:00 a.m. The defendant requires additional time in which to conduct further investigation and to meet with counsel for the government in order to determine whether the matter can be resolved without a trial. The parties agree that time should be excluded through August 12, 2005 under Local Rule T-4.

McGREGOR W. SCOTT
United States Attorney

DATED: June 30, 2005

/s/ Quin Denvir
Telephonically authorized to sign for
R. STEVEN LAPHAM
Assistant United States Attorney

DATED: June 30, 2005

/s/ Quin Denvir
QUIN DENVIR
Federal Defender

O R D E R

FOR GOOD CAUSE SHOWN, IT IS SO ORDERED.

Dated: July 1, 2005

/s/ Garland E. Burrell, Jr.
GARLAND E. BURRELL, JR.
United States District Judge